

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by: Mary Beth Brangan
P.O. Box 10047
Bollinas, CA. 94924
marybeth@eon3.net
415-868-1900

February 4, 2013

AFFIDAVIT OF - Mary Beth Brangan

State of California
Marin County

I, Mary Beth Brangan, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Mary Beth Brangan My address is P.O. Box 1047, Bolinas, CA. 994924
2. I am a filmmaker, journalist, and educator.
3. Since co-producing the award-winning and widely distributed documentary PUBLIC EXPOSURE: DNA, Democracy and the 'Wireless Revolution' in 2001, I have been extensively involved as a media producer, investigative journalist and community organizer in public education efforts to prevent human health risks from proliferating electromagnetic pollution.
4. I am the Co-Director of [EON, the Ecological Options Network](#), a non-profit organization focusing on technology and public health and safety issues. Our extensive roster of video productions is available on our [YouTube channel](#). Our blog is [eon3EMFblog.net](#).
5. I am involved with local, regional, national and international public education and policy-making efforts regarding both ionizing and non-ionizing radiation issues.
6. I applaud this decision to update the woefully obsolete FCC standards for RF exposure levels.
7. Thousands of independently funded, as opposed to industry funded, scientific studies from the 1930's to 1970's ([Zory Glaser's archives](#)) as well as approximately 4,000 studies reviewed by the international team of experts in the [BioInitiative Report 2007](#) and

[BioInitiative Report 2012](#), show biological effects well below current allowed exposures by FCC standards.

8. I advocate using the current recommendation from the BioInitiative 2012 for a precautionary action level protective of public health, which is 0.0003 uW/cm² to 0.0006 uW/cm² for cumulative outdoor pulsed RFR. I would also recommend regularly reassessing this level as new evidence emerges about exposures and biological effects.

9. Additionally, since the only basis for current standards is what is necessary to heat tissue of a 200 pound male from a single exposure, standards must be re-calibrated to include the following realities as the basis for standards that are adequately protective of public health.

10. Independently funded scientific studies showing evidence of RF exposures causing bio-effects at levels many thousands of times lower than current levels is plentiful. Low level exposures are clearly biologically active and the effects of EMF/RF on opening and closing of cell membranes and influencing ion channels has been known for a long time.

11. Multiple exposures are the norm today: wi-fi is in both households and city-wide as well as regional beamed, cell phones, automated digital mesh-networked electrical, gas and water meters, cordless phones, baby monitors, motion detectors, ‘smart’ appliances communicating 24/7 with ‘smart’ meters, etc., etc.

12. Multiple exposures are continuous and full body (see above);

13. Smaller people, women, children, fetuses, and the frail, elderly and sick are more sensitive to RF exposures than the SAM (Standard Anthropomorphic Man) currently used, who is fully grown, 6'2, and close to 200 pounds.

14. There are many situations where multiple sources amplify effects, such as banks of many AMI ('smart') meters on apartment walls or in business buildings.

15. Reflective surfaces can cause 'hot' spots of re-radiated and intensified exposures from single sources such as in cordless phones in corners in rooms with stainless steel surfaces.

16. Exponentially intensified exposures are caused by reflective metal surfaces re-radiating signals from many users of RF devices from multiple sources such as many cell phone and I-Pad users simultaneously operating devices in buses, trains, cars, airplanes. These facts all must be factored into establishing a standard adequately protective of public health.

17. Incorporated here by reference in its entirety :

BioInitiative Report 2007; <http://www.bioinitiative.org/table-of-contents/>

BioInitiative Report 2012; <http://www.bioinitiative.org/>

Zory Glaser's Archives; <http://www.magdahavas.com/category/from-zorys-archive/>

ICEMS Monograph, Non-Thermal Effects of Electromagnetic Fields;
World Health Organization's International Agency for Research on Cancer (IARC)
classification of RF as a 2b carcinogen; <http://electromagnetichealth.org/electromagnetic-health-blog/iarc-rf-carc/>

Dr. Martin Blank, Columbia University, Mechanisms of Harm.
<http://eon3emfblog.net/?p=5468>

Hondou 2002 and Hondou 2006 studies: Passive Exposure to Mobile Phones:

Enhancement of Intensity by Reflection:

https://docs.google.com/viewer?a=v&q=cache:W8Wq6xILE9EJ:arxiv.org/pdf/physics/0703124+&hl=en&gl=us&pid=bl&srcid=ADGEESi2V-GHLXyaWnnuuoMSYHMOVw4tdNqqqOdOP4GCBzOFM7uXjGFj1jFNM055X7vIrO_

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Respectfully submitted by

Mary Beth Brangan

P.O. Box 1047

Bolinas, CA. 94924

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